

20 July 1994

MEMORANDUM

From: Code 1823/DEC  
To: File

Subj: NAVY RESPONSE TO COMMENTS ON DRAFT PHASE II RI FOR SITE 09  
(OLD FIRE FIGHTER TRAINING AREA); RECORD OF CONFERENCE  
CALL

Attendees: Andy Miniuks (EPA)                      Todd Bober (NORTHDIV)  
Mary Pothier (CDM)                                Bob Smith (TRC-EC)  
Paul Kulpa (RIDEM)                                Jim Peronto (TRC-EC)  
Debbie Carlson (NORTHDIV)                      Jennifer Cunningham (TRC-EC)

1. Conference call began at 1:00 on July 20, 1994 to discuss any clarification/ discussion on the Navy's Response to Comments on the Draft Phase II RI Report for Site 09. Responses were distributed to EPA and RIDEM on 30 June 1994 and the Draft Final Report is due 13 August 1994.

2. EPA requested further discussion on the following comment/responses:

4. The Navy has not substantiated the claim that the polynuclear aromatic hydrocarbons (PAHs) detected at the site are from atmospheric deposition, sewage influent, CSO discharges, and/or urban runoff. If the Navy believes that these are the sources of the PAHs rather than activities which have historically taken place at the site, then revise the text to provide additional data to justify this proposed position.

*EPA inquired if the Navy had additional data which would support the claim that PAH's are from other sources. The report would be siting specific references from other studies conducted by researchers on Narragansett Bay that state the same claim that sources of PAHs could come from a number of sources. The Navy is not saying that Site 09 is not a potential source but is saying it is not the only potential source.*

5. Given the compositing of the near and off-shore sampling, the nature and extent of contamination is still not delineated. As has previously discussed, EPA rejected the compositing of these samples during the review of the work plans.

*EPA questioned if the text would be modified to state that compositing of samples was conducted by the Navy on their discretion despite the fact that EPA rejected compositing*

*during review of the work plan. No - The Navy feels this comment has been documented in enough correspondence including this comment.*

14. Section 2.2.3 Magnetometer Survey, Page 2-6  
Under this section, the survey results are broadly discussed and generally interpreted as being negative; however, the data results are not provided in the report.

Revise the report to include the results in the appendices.

Confirm if any contouring was done with the data. If contouring was done, include this figure within the report.

*EPA requested further clarification on what would be provided in the revised RI report. The revised report would include in an appendix contour maps of the magnetometer and EM data.*

36. Revise the tables to include a comparison between the analytical results from the sampling locations for each media and the background samples.

*EPA requested that other background sample data also be included in summary tables similar to the background soil metals data. It was agreed to add these additional summary tables to the revised RI report for the soils and ground water.*

48. Vol. III-2, Page 13 - Both the text and Figure 9 show a test pit was planned for the western portion of the site.

Revise the text of the draft RI report to provide a clear explanation for why it was not completed.

*EPA recommended that the revised RI Report further document why changes were made during the fieldwork which deviated from the work plan as specified in Comments #48. The report will include response to this comment in the test pit discussion in Section 2.5.1.*

49. Vol. III-2, page 15 - The text states a total of 10 wells were to be installed; Figure 10 shows both a shallow and bedrock well were to be installed at MW-9. On page 2-17 of the draft RI report, the text states that only nine wells have been installed, and Figure 2-8 does not show a shallow well having been installed at MW-9.

Revise the text of the report to include an explanation for not installing this well.

*EPA recommended that the revised RI Report further document why changes were made during the fieldwork which deviated from the work plan as specified in Comments #49. The report*

*will provide the required justification why the Navy deviated from the work plan. For example, the report will explain that there was no groundwater for the shallow monitoring well and only the bedrock well was installed.*

3. The following comments/discussion pertained to general concerns on the Human Health Risk Assessment

- *Pesticides will be kept as a contaminant of concern.*
- *Data from SS-30 will be eliminated from the background HHRA calculations. It will still be provided in the site soil data set but an explanation as to why its not being considered as an appropriate background sample will be included in the RI and HHRA reports. However, it will not be included with the site specific surface soil data due to its location far off of the site.*
- *EPA (Ann Marie Burke) stated that the ingestion of groundwater scenario should be consistent with the State's classification. Groundwater in that area is classified as GB which is considered a potential drinking water source with treatment. Discussion with RIDEM provided a "grey" interpretation on whether GB is actually appropriate for this area and that the State is in the process of promulgating class-specific groundwater standards.*

*The Navy will have to meet and discuss the approach on how to present the HHRA with respect to the ground water scenario.*

4. RIDEM provided general comments/concerns on the Human Health Risk Assessment and stated they would be contacting the Navy to discuss in more detail. The general concerns were as follows:

- *Ingestion of shellfish by children and subsistence fisherman. The HHRA was calculated based on 30 years and RIDEM is questioning why 70 years was not used.*
- *Groundwater scenario which was discussed above.*
- *With respect to TPH analysis, RIDEM feels that the report should clarify that the VOC and SVOC analysis may not show everything detected under a TPH analysis.*
- *Historical diagrams of piping networks; RIDEM is still requesting such information and is working with NETC to search for any such diagrams in the NETC archives.*
- *Scenario for groundwater ingestion*
  - *Future commercial/industrial*
  - *Future daycare*
  - *Other ....*

5. Based on the conference call, TRC-EC will proceed with revisions to the Draft Phase II RI Report and HHRA to meet the next submission date of 13 August 1994.

6. D. Carlson will contact RIDEM on 25 July 1994 to try and establish a conference call to discuss any specific responses.

7. The Navy and TRC-EC must finalize which ground water scenario will be calculated in the HHRA.

8. Conference call concluded at 2:00.

*Debbie Carlson*

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